

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 05-11803-MLW

SHENIA DANCY-STEWART as  
Administratrix of the Estate  
of EVELINE BARROS-CEPEDA,  
MARIA DaROSA, and LUIS  
CARVALHO,  
Plaintiffs,

v.

THOMAS TAYLOR, Jr., and the  
CITY OF BOSTON,  
Defendants.

JOINT STATEMENT

Pursuant to the Court's Notice of Scheduling Conference and Rule 16.1(D) of the Local Rules of the United States District Court for the District of Massachusetts, the parties propose the following pretrial schedule:

1. Proposed Joint Discovery Plan and Motion Schedule:

The Parties propose the following pre-trial schedule:

- (a) Automatic document disclosures will be completed on or before October 18, 2006;
- (b) Written discovery requests are to be served by February 19, 2007 and answers/responses are to be served within the time provided by the Federal Rules of Civil Procedure and/or the Local Rules of the District of Massachusetts;
- (c) All depositions are to be completed by August 20, 2007, except for expert witness;
- (d) The plaintiffs' expert witnesses shall be designated by August 20, 2007, and defendants' expert witnesses shall be designated within 30 days after plaintiff discloses said expert(s) as contemplated by Fed. R. Civ. P. 26(b)(4)(A); designation of experts shall include provision of any

information required by the Federal Rules of Civil Procedure and/or the Local Rules of the District of Massachusetts; any expert depositions shall be completed within 60 days of defendants' expert designation;

- (e) All dispositive motions are to be filed by October 31, 2007, and responses are to be filed fourteen days thereafter pursuant to Local Rule 7.1;
- (f) The plaintiff shall name other parties, if any, not later than August 30, 2007;
- (g) A final pre-trial conference will be held per order of the Court.

2. Defendants intend to take no more than 10 depositions during the discovery period, in conformity with Fed. R. Civ. P. 30(a)(2)(A) and LR, D. Mass. 26.1(C).
3. Certifications regarding each parties' consultation with counsel regarding budgets and alternative dispute resolution will be filed separately.

PLAINTIFFS SHENIA DANCY-STEWART as Administratrix of the Estate of EVELINE BARROS-CEPEDA, MARIA DaROSA, and LUIS CARVALHO,

By their attorney:

/s/ Andrew Stockwell-Alpert

---

Andrew Stockwell-Alpert  
11 Beacon Street  
Suite 1210  
Boston, MA 02108  
(617) 720-4244

Respectfully submitted,

DEFENDANTS CITY OF BOSTON, AND THOMAS TAYLOR,

William F. Sinnott  
Corporation Counsel

By its attorneys:

/s/ Helen G. Litsas

---

Kate Cook BBO# 650698  
Helen G. Litsas BBO#644848  
Assistant Corporation Counsel  
City of Boston Law Department  
Room 615, City Hall  
Boston, MA 02201  
(617) 635-4022 (Cook)  
(617) 635-4023 (Litsas)